

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
TERRE HAUTE DIVISION

ANTONIO D. HANDLEY,  
*Plaintiff,*

No. 2:21-cv-00058-JPH-DLP

vs.

WEXFORD MED. SERVICES, LLC, *et al.*,  
*Defendants.*

**FILED**

**08/18/2022**

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
Roger A.G. Sharpe, Clerk

**PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS**

Comes the Plaintiff, Antonio Handley, *pro se*, pursuant to Federal Rule 34 to direct the Defendants, WEXFORD of Indiana, LLC, CENTURION HEALTH of Indiana, LLC, to produce for inspection, photo-copying, and reproduction, by the Plaintiff, Antonio Handley, within thirty (30) days of the date of service of this request – or at such other time and place as may be stipulated by the named parties – the following documents, objects or tangible things:

1. Wexford of Indiana, LLC:

- i. All contracts, agreements, pacts for services and employment with regard to the DEFENDANTS: Dr. Michael Mitcheff, Dr. Naveen Rajoli, Adrina McDonald, and Amy Wright;
- ii. All contacts, agreements, pacts for services and/or employment with regard to DEFENDANT: Dr. H. Dennis Lewton II;
- iii. Wexford's contract with the Indiana Dep't of Correction for medical care of the prisoner-patient population;
- iv. Wexford's policy as it relates to surgical correction of cataracts, sometimes referred to as the "one good eye" policy;
- v. Wexford's guidelines as they relate to a "WEXFORD TECHNICAL PROPOSAL" which deals directly with "Wexford's goal ... to help IDOC avoid offender transport

and off-site security costs[,]” and “Wexford[’s] ... effort to minimize offsite clinic trips.”

2. Centurion Health of Indiana, LLC:

- i. All contracts, agreements, pacts for services and employment with regard to the DEFENDANTS: Dr. Naveen Rajoli, Adrina McDonald, and Amy Wright
- ii. All contacts, agreements, pacts for services and/or employment with regard to DEFENDANT: Dr. H. Dennis Lewton II;
- iii. Centurion’s contract for medical care services of the prison-patient population with the Indiana Dep’t of Correction;
- iv. Centurion’s guidelines as they relate to any “TECHNICAL PROPOSAL” or document that identifies its policies for: (a) offsite care, (b) minimization of security costs, (c) and what constitutes a need for corrective surgery for cataracts (similar to WEXFORD’s “one good eye” policy;
- v. Centurion is also requested to identify its “regional medical director” or decision maker, like Defendant Wexford’s RMD, Defendant, Dr. Michael Mitcheff.

3. The requested documents are necessary to discover the extent to which the DEFENDANTS acted with regard to their employers’ policies, customs, and/or practices as they relate to the care and treatment of prisoner-patients, such as the Plaintiff, Antonio Handley;

4. In addition, the requested contracts between the Defendant companies and IDOC are relevant and necessary to discover the liability exposure that said Defendant companies assume as it would relate to their contractual obligations as State-actors for IDOC;

5. These materials are relevant and necessary in the event the Defendants intend to file a dispositive motions on or before November 28<sup>th</sup> 2022. Alternatively, these materials are necessary for trial to establish causal links between the Defendants’ actions, choices for treatment, and decisions; and their Defendant companies’ governing policies, practices, and/or customs.

Counsel for parties are further requested to furnish an affidavit stating that production of the requested materials has been completed, within thirty (30) days of the filing of this request, and to provide a list of such items not produced. In the event of an objection, the parties should state the grounds for the objection, and provide the name and address of the person having custody of the requested discovery items.

Respectfully submitted,

/s/ Antonio Devon Handley

DOC# 998126

Appellant, *pro se*

Wabash Valley Correctional Facility  
6908 S. Old U.S. Hwy 41, P. O. Box 1111  
Carlisle, Indiana 47838

CERTIFICATE OF SERVICE

I certify that on this 18<sup>th</sup> day of **August, 2021**, a copy of the foregoing, PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, was served upon all parties by Indiana's Electronic Prison (E-filing) system.

Distribution:

Douglass R. Bitner  
KATZ, KORIN & CUNNINGHAM, P.C.  
334 N. Senate Avenue  
Indianapolis, IN 46204  
*Counsel for Defendants: Wexford Health Sources, Inc.,  
Adrina McDonald, Michael Mitcheff, Amy Wright*

Alex M. Beeman  
REMINER CO., LPA  
123 N.W. 4<sup>th</sup> St., Ste. 419  
Evansville, IN 47708  
*Counsel for Defendant: Dr. Harold Dennis Lewton II*

Christopher A. Farrington  
BLEEKE, DILLON, CRANDALL  
8470 Allison Pointe Blvd., Ste. 204  
Indianapolis, IN 46250-4365  
*Counsel for Defendants: Centurion  
Health of Indiana, LLC, Dr. Naveen  
Rajoli*

/s/ Antonio Devon Handley

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